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**AMENDED COMPLAINT**  
(for filers who are prisoners without lawyers)

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2025 FEB 21 P 2:15

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

(Full name of plaintiff)

Matthew Poe

v.

Case Number:

24-CV-1606

(to be supplied by Clerk of Court)

(Full name of defendant(s))

DSO Munger

DSO June

Pollyanna (Medical Provider)

**A. PARTIES**

1. Plaintiff is a citizen of Illinois and is located at  
(State)

4777 88th Ave Kenosha, WI 53144  
(Address of prison or jail)

2. Defendant DSO Munger  
(Name)

is (if a person or private corporation) a citizen of unknown  
(State, if known)

Amended Complaint - 1



## Parties

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### Defendants

DSO June

Citizen: Unknown

Resides: Unknown

work for: Kenosha County Department of Corrections  
4777 88th Ave Kenosha WI 53144

Ms Pollyanna (Medical Provider)

Citizen: Unknown

Resides: Unknown

work for: Napha Care / Kenosha County Department  
of Corrections 4777 88th Ave Kenosha, WI 53144



and (if a person) resides at Unknown

(Address, if known)

and (if the defendant harmed you while doing the defendant's job) 4727 88th Ave

Kenosha, WI

worked for Kenosha County Department of Corrections 53144

(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On or about the second week of July 2024 I had a really bad back pain that ended up being STaph Infection that needed immediate Surgery which occurred July 26 2024.

Statement of Claim (1) After the Surgery the order given by the Surgeon was to redress my wound twice a day. (2) 8/17/24 I was allowed Recreation time while housed in medical ward. So I asked DSO Munger if he would Please get the wheelchair for me. At first he refused but then he asked if I had a wheelchair Permit the nurse said Yes and a wheelchair was provided for me. DSO Munger then stated that I need to have the nurse change the Paperwork. Since I'm a



and not much attention is given to my words, Can you ask them to Change it (3) At that moment DSO Munger began to yell at me at such close range that his Spit was Landing on my Face and Stated "I dont Fix Paperwork" cuffed me up and took me Segregation for 24 hrs I was denied the medical attention I needed including redressing my wounds (4) On 8/19/24 my bandage came off my back, causing my wound to Bleed, and leak Puss, and run risk of Infection. Noticing there was no Nurse around and DSO Slatner was not on his Post. I decided to push the Emergency Button (medical) and for do so I was written up and punished (5) On 9/10/24 the Surgeon ordered for my wound to be cleaned and dressed twice a day to keep my wound clean and safe from infection. and when I noticed that this order was not being met I asked why and the nurse told me that the medical Provider (MS Pollyanna) had changed the orders, to once a day dressing change. AS well as there were days that the bandages were never Changed at all Aug 11, 12, 13, 15, 16, 17, and 30<sup>th</sup> of 2024 further putting me at Risk of Infection and further Injury. (6)



## (Continue Statement of Claim)

⑥ The Plaintiff therefore demands compensation for a 14<sup>th</sup> Amendment Violation under Clear Circuit and Supreme Court Precedent the 14<sup>th</sup> Amendments Due Process Clause Prohibits holding pretrial detainees in conditions that amount to Punishment because Pretrial Confinees are not similarly situated they are not under a sentence of confinement because they have not yet been convicted it can not be said that they ought to expect whatever deprivation can be considered "Incident" to serving a sentence while imposing Segregation or lockdown in response to legitimate discipline or security concerns may be permissible, taking the Plaintiff to Segregation because of medical reasons or request for an approved wheelchair is unlawful and amounts to impermissible Punishment

⑦ The Plaintiff also demand compensation for 8<sup>th</sup> amendment violation for the deliberate indifference or negligence to Plaintiff's medical needs under the 8<sup>th</sup> amendments prison officials must meet the medical needs of inmates, The Jail Authority must have the Prisoners as they find him and provide facilities compatible with his physical condition that meet civilized Standard of decency Specially to a Pretrial detainee, which medical staff and correctional staff failed to meet by not following Surgeons orders in a negligent manner. As well as the denial of wheelchair and to be protected from further infection by providing unsanitary showers as well as unregulated water from showers therefore water not being too hot to properly bath with wound



C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff is different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

To have no contact With DSO Munger, and an  
awardment of \$600,000 dollars for Physical, emotional/  
and Mental Distress

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 18<sup>th</sup> day of Feb. 2025.

Respectfully Submitted,

Mauro Po

Signature of Plaintiff

700052

Plaintiff's Prisoner ID Number

4777 88<sup>th</sup> Ave

Kenosha WI 53144

(Mailing Address of Plaintiff)

Matthew Poe  
477 88<sup>th</sup> Ave  
Kenosha, WI 53144

MILWAUKEE WI 530  
Legal Mail 6:25 PM



United States District Court  
Eastern District of Wisconsin  
517 E Wisconsin Ave Room 362  
Milwaukee, WI 53202

53202-458299